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**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

Application of Pacific Gas and Electric Company for Compliance Review of Utility Owned Generation Operations, Portfolio Allocation Balancing Account Entries, Energy Resource Recovery Account Entries, Contract Administration, Economic Dispatch of Electric Resources, Utility Owned Generation Fuel Procurement, Diablo Canyon Seismic Studies Balancing Account, and Other Activities for the Record Period January 1 Through December 31, 2019.

(U 39 E)

Application No. 20-02-_____

**APPLICATION OF PACIFIC GAS AND ELECTRIC COMPANY (U 39 E)
FOR COMPLIANCE REVIEW OF UTILITY OWNED GENERATION OPERATIONS,
PORTFOLIO ALLOCATION BALANCING ACCOUNT ENTRIES, ENERGY RESOURCE
RECOVERY ACCOUNT ENTRIES, CONTRACT ADMINISTRATION, ECONOMIC
DISPATCH OF ELECTRIC RESOURCES, UTILITY OWNED GENERATION FUEL
PROCUREMENT, DIABLO CANYON SEISMIC STUDIES BALANCING ACCOUNT,
AND OTHER ACTIVITIES FOR THE RECORD PERIOD
JANUARY 1 THROUGH DECEMBER 31, 2019**

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RESOURCE RECOVERY ACCOUNT ENTRIES, CONTRACT ADMINISTRATION,
ECONOMIC DISPATCH OF ELECTRIC RESOURCES, UTILITY OWNED
GENERATION FUEL PROCUREMENT, DIABLO CANYON SEISMIC STUDIES
BALANCING ACCOUNT, AND OTHER ACTIVITIES FOR THE RECORD PERIOD
JANUARY 1 THROUGH DECEMBER 31, 2019**

I. INTRODUCTION

Pacific Gas and Electric Company (PG&E) submits this *Application for Compliance Review of Utility Owned Generation Operations, Portfolio Allocation Balancing Account Entries, Energy Resource Recovery Account Entries, Contract Administration, Economic Dispatch of Electric Resources, Utility Owned Generation Fuel Procurement, Diablo Canyon Seismic Studies Balancing Account, and Other Activities for the Record Period January 1 Through December 31, 2019* (2019 ERRRA Compliance, or Application), pursuant to California Public Utilities Code Section 454.5(d), Rules 2.1 and 3.2 of the Rules of Practice and Procedure of the California Public Utilities Commission (Commission), and relevant Commission decisions.

PG&E respectfully requests that the Commission find that during the record period PG&E complied with its Commission-approved Bundled Procurement Plan (BPP) in the areas of fuel procurement, administration of power purchase contracts, greenhouse gas compliance

instrument procurement, resource adequacy sales, and least-cost dispatch of electric generation resources. PG&E requests that the Commission find that during the record period PG&E managed its utility-owned generation (UOG) facilities reasonably.

PG&E requests that the Commission find that the record period expenditures in the Diablo Canyon Seismic Studies Balancing Account (DCSSBA), the Green Tariff Shared Renewables Memorandum Account (GTSRMA), and Disadvantaged Communities Single Family Solar Affordable Homes (DAC-SASH) memorandum subaccount (DACSASHMA) were reasonable, and that the record period entries in the Portfolio Allocation Balancing Account (PABA), Energy Resources Recovery Account (ERRA), Green Tariff Shared Renewables Balancing Account (GTSRBA), and DAC-SASH balancing account (DACSASHBA) were consistent with applicable tariffs and Commission directives.

PG&E also requests that the Commission approve the cost recovery proposed in PG&E's Prepared Testimony, which is being provided concurrent with this Application. Specifically, PG&E is seeking recovery of revenue requirements totaling \$3.996 million for Diablo Canyon seismic study costs, reflecting the actual recorded costs presented in the DCSSBA plus interest.

On February 27, 2020, one day prior to filing this Application, the Commission approved the *Decision Adopting Pacific Gas and Electric Company's 2020 Energy Resource Recovery Account Forecast and Generation Non-Bypassable Charges Forecast and Greenhouse Gas Forecast Revenue Return and Reconciliation* (2020 Forecast Decision).^{1/} PG&E is reviewing the decision and will provide supplemental testimony as necessary on April 13, 2020.

II. BACKGROUND

In 2002, the California Legislature and the Commission established the regulatory framework for PG&E, Southern California Edison Company (SCE), and San Diego Gas & Electric Company (SDG&E) (collectively, the utilities) to resume electricity procurement,

^{1/} Decision (D.) 20-02-047.

beginning January 1, 2003. Public Utilities Code Section 454.5(d)(2) provided for a procurement plan that would:

Eliminate the need for after-the-fact reasonableness reviews of an electrical corporation's actions in compliance with an approved procurement plan, including resulting electricity procurement contracts, practices, and related expenses. However, the commission may establish a regulatory process to verify and assure that each contract was administered in accordance with the terms of the contract, and contract disputes which may arise are reasonably resolved.

In Decision (D.) 02-10-062, the Commission implemented Section 454.5(d) by establishing ERRA balancing accounts for PG&E and the other utilities, requiring the utilities to track fuel and purchased power revenues against actual recorded costs,^{2/} and to establish an annual ERRA compliance review for the previous year. Since D.02-10-062 was issued, the Commission has addressed PG&E's ERRA compliance applications in a number of proceedings.^{3/} In 2018, the Commission significantly modified the ERRA balancing accounts and created a new balancing account to track the above-market costs and revenues associated with the utilities' electric portfolios, called the Portfolio Allocation Balancing Account (PABA) in D.18-10-019. PG&E presents the PABA for the first time in this Application pursuant to D.18-10-019.^{4/}

In D.15-10-031, the Commission approved PG&E's 2014 BPP. PG&E updates the BPP to respond to market activity and seeks Commission approval via Advice Letter. The Conformed 2014 BPP is included as workpapers to the testimony. On May 30, 2019, the Commission

^{2/} The ERRA records energy costs associated with serving bundled electric customers. The Ongoing Competition Transition Charge (CTC) consists of eligible contract arrangements entered into before December 20, 1995, and QF contract restructuring costs. Ongoing CTC costs are recorded in the Modified Transition Cost Balancing Account (MTCBA).

^{3/} See D.05-04-036 (January through May 2003); D.05-07-015 (June through December 2003); D.05-11-007 (2004); D.06-12-009 (2005); D.07-11-027 (2006); D.08-10-002 (2007); D.09-12-002 (2008); D.11-07-039 (2009); D.13-10-041 (2010); D.14-01-011 (2011); D.15-05-006 (addressing least-cost dispatch issues from the 2010 ERRA compliance proceeding); D.15-12-015 (modifying D.15 05 006); D.16-04-006 (2012); D.18-05-025 (2013); D.16-12-045 (2014); D.17-03-021 (2015); D.18-05-004 (2016); D.19-02-005 (2017); and D.20-02-006 (2018).

^{4/} Ordering Paragraph (OP) 8 directs that PABA entries be reviewed in each utility's annual ERRA Compliance proceeding.

approved a new Appendix S to the BPP, which establishes a framework to conduct resource adequacy sales.^{5/} Apart from Appendix S, the remaining 2014 BPP was in effect during the entire 2019 record period and is the basis for PG&E's 2019 compliance activities.

The ERRA regulatory process includes two annual proceedings. The first is an annual ERRA Compliance proceeding to review the utility's compliance with Commission-approved standards for generation-procurement and cost recovery activity occurring in the preceding year, such as energy resource contract administration, least-cost dispatch, fuel procurement, and balancing account entries. The second is an annual "ERRA Forecast" proceeding, which sets generation rates for the coming year based on a forecast of the utility's electric procurement cost revenue requirement and electricity sales. PG&E's most recent ERRA Forecast proceeding, for forecast year 2020, was filed as Application (A.) 19-06-001.

III. STANDARD OF REVIEW AND COMMISSION REQUIREMENTS

The Commission has issued a number of decisions discussing the standards of review for specific aspects of the utilities' ERRA Compliance applications, as well as requirements for additional information that should be included in ERRA Compliance applications. In general, PG&E has the burden of proof in ERRA Compliance proceedings and satisfies that burden of proof based on a preponderance of the evidence.^{6/} In addition to this general principle regarding the burden of proof, the Commission has also adopted specific standards of review for various aspects of the ERRA Compliance application. Below, PG&E provides an overview of the standards of review for this Application, as well as Commission requirements for additional information and materials to be included in PG&E's ERRA Compliance application, testimony, and workpapers.

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^{5/} Resolution E-4998.

^{6/} D.16-04-006 at p. 11.

A. Least-Cost Dispatch

The standard of review for achieving least-cost dispatch under Standard of Conduct 4 (SOC 4) is compliance with the bundled procurement plan and applicable Commission Decisions.^{7/} PG&E's 2014 Bundled Procurement Plan was approved in D.15-10-031 and was in effect during the 2019 record period.

PG&E's burden of proof to demonstrate compliance is established by various Commission Decisions and Settlement Agreements. In D.15-05-006, as modified by D.15-12-015, the Commission adopted, with minor modifications, the *Joint Utilities' Proposal for the Demonstration of Least-Cost Dispatch*^{8/} and also required the utilities to include information identified in the *Metrics for Demand Response* proposed by the Public Advocates Office at the California Public Utilities Commission (Cal Advocates), formerly the Office of Ratepayer Advocates.^{9/} The Commission consolidated the joint utilities' proposal, with modifications, and Cal Advocates' demand response metrics in Attachment A to D.15-12-015.

In addition, PG&E and Cal Advocates entered into settlement agreements in the 2014 ERRR Compliance proceeding (2014 ERRR Settlement) and 2015 ERRR Compliance proceeding (2015 ERRR Settlement) that included agreements related to the least-cost dispatch and demand response showings in future ERRR Compliance proceedings.^{10/} The Commission approved the 2014 ERRR Settlement in D.16-12-045 and the 2015 ERRR Settlement in D.17-03-021. PG&E's showing in this Application is consistent with the Commission's requirements in D.15-05-006 and D.15-12-015 and incorporates the least-cost dispatch and demand response requirements from the 2014 and 2015 ERRR Settlements. The least-cost dispatch and demand

^{7/} See D.03-06-076 at p. 25, D.05-01-054 at p. 13, and D.11-10-002 at p.5.

^{8/} D.15-05-006, OP 1 and OP 3.

^{9/} The Office of Ratepayer Advocates was renamed the Public Advocates Office of the California Public Utilities Commission pursuant to Senate Bill No. 854, which was enacted on June 27, 2018 (Chapter 51, Statutes of 2018).

^{10/} See *Pacific Gas and Electric Company's and the Office of Ratepayer Advocates' Motion for Approval of Proposed Settlement*, filed September 10, 2015 in A.15-02-023 and *Joint Motion of Pacific Gas and Electric Company (U 39 E) and the Office of Ratepayer Advocates for Approval of Proposed Settlement*, filed November 16, 2016 in A.16.02-019.

response showing for the record period is included in Chapter 1 of PG&E's Prepared Testimony and the detailed workpapers associated with Chapter 1.

B. Utility-Owned Generation Operation

With regard to the operation of UOG resources, the Commission has applied a reasonable manager standard.^{11/} Under the reasonable manager standard,

utilities are held to a standard of reasonableness based upon the facts that are known or should have been known at the time. The act of the utility should comport with what a reasonable manager of sufficient education, training, experience, and skills using the tools and knowledge at his or her disposal would do when faced with a need to make a decision and act.^{12/}

The utility has the burden of proof to show that the reasonable manager standard has been met. For purposes of this Application, Chapters 2-4 of the Prepared Testimony and the corresponding workpapers satisfy PG&E's burden of proof that it operated its UOG facilities in compliance with the Commission's reasonable manager standard.

C. Contract Administration, Fuel Costs, and Hedging

With regard to contract administration, the Commission reviews whether procurement contracts have been administered prudently and in compliance with the contract provisions.^{13/} In Chapter 9 of the Prepared Testimony and the corresponding workpapers, PG&E demonstrates that it prudently administered its contracts.

PG&E recovers fuel costs associated with its UOG facilities and certain third-party contracts and hedging costs through PABA or ERRA. The Commission reviews whether PG&E complied with the Commission-approved BPP for both fuel procurement costs and hedging costs. PG&E demonstrates compliance specifically with its BPP hedging plan through its discussion of electric portfolio hedging activities that occurred during 2019 and describing its

^{11/} D.11-10-002, p. 11; D.16-04-006, pp. 11-12.

^{12/} Id., p. 11, n. 2 (quoting D.90-09-088, 37 CPUC 2d 488, 499 (1990)).

^{13/} D.11-07-039, p. 9; see also D.16-04-006, p. 12 ("prudent" management is the same as the "reasonable" manager standard).

internal procedures and controls.^{14/} These fuel cost and hedging compliance showings are in Chapter 6 of the Prepared Testimony.

D. GHG Compliance Instrument Procurement

In D.12-04-046, the Commission authorized PG&E to procure allowances and offsets necessary to meet its Greenhouse Gas (GHG) compliance obligations. The Commission reviews whether PG&E's GHG compliance instrument procurement complies with its GHG Procurement Plan, as set forth in its BPP.^{15/} In addition to demonstrating compliance for GHG instrument procurement, PG&E provides an analysis on its contract management decision to financially settle or physically settle tolling agreements, pursuant to its 2017 ERRA Settlement Agreement approved by the Commission in D.19-02-005. Contract management decisions are assessed using the reasonable manager standard, as described above in Section III.C. PG&E's GHG procurement compliance showings are in Chapter 7 of the Prepared Testimony.

E. Resource Adequacy Sales

In Resolution E-4998, the Commission approved PG&E's BPP Appendix S, which established a framework for resource adequacy sales conduct. Consistent with the "compliance review" standard used for assessing PG&E's conduct on other BPP activities, PG&E requests that this standard of review extend to Appendix S, as of its effective date, May 30, 2019. PG&E's compliance with Appendix S is demonstrated in Chapter 8.

F. Energy Resource Recovery Account

The ERRA Balancing Account is audited by the Commission to ensure that recorded entries are reasonable, accurate, and consistent with Commission decisions. PG&E requests the Commission find its recorded entries to ERRA are appropriate, correctly stated, and in compliance with Commission decisions, as demonstrated in Chapter 13 and related workpapers.

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^{14/} D.11-07-039, OP 4.

^{15/} D.18-05-025, p. 48.

G. Portfolio Allocation Balancing Account

The Commission established the PABA in D.18-10-019. The PABA is a new two-way cost balancing account that trues up the above-market forecast of generation resources recovered through the Power Charge Indifference Adjustment (PCIA) with actual recorded costs and revenues. D.18-10-019 directed that “the accuracy of the entries into the vintage subaccounts” be reviewed in each utility’s ERRA compliance proceeding. PG&E requests that the Commission find its recorded entries to PABA are accurate, as demonstrated in Chapter 12.

H. Other Balancing Accounts and Memorandum Accounts

1. Diablo Canyon Seismic Studies Balancing Account

In D.10-08-003, the Commission granted PG&E’s request to comply with the California Energy Commission’s recommendation to perform additional seismic studies in and around the Diablo Canyon Power Plant (DCPP) as a part of the relicensing process. On September 13, 2012, the Commission approved D.12-09-008 which: (1) authorized PG&E to record and recover its actual costs of implementing DCPP seismic activities;^{16/} and (2) directed PG&E to recover balances in the DCSSBA, including balances recorded in the Independent Peer Review Panel subaccount in PG&E’s annual ERRA Compliance proceedings.^{17/} PG&E is required to provide support for the amounts actually incurred and recorded in the DCSSBA, and show that these amounts are consistent with PG&E’s request in its seismic studies application (i.e., A.10-01-014) and were reasonably incurred.^{18/}

In D.14-08-032, the Commission directed that costs associated with PG&E’s Long Term Seismic Program (LTSP) be transferred to the DCSSBA and that the LTSP costs be reviewed as part of the ERRA compliance review.^{19/} D.17-05-013, the Commission decision authorizing PG&E’s 2017-2019 General Rate Case revenue requirement, adopted a settlement agreement under which PG&E agreed to remove \$4.2 million in LTSP costs from the 2017-2019 revenue

^{16/} D.12-09-008, OP 1.

^{17/} Id., OPs 4 and 10.

^{18/} Id.; see also D.16-04-006, p. 12.

^{19/} D.14-08-032, p. 411.

requirement and to continue the practice of recording annual seismic studies costs to the DCSSBA.

In Chapter 5 of PG&E's Prepared Testimony and the corresponding workpapers, PG&E provides an accounting of amounts actually incurred and recorded in the DCSSBA for the record period and demonstrates that the amounts are reasonable. Chapter 15 sets out PG&E's cost recovery request associated with the DCSSBA.

2. Green Tariff Shared Renewables Memorandum Account

In D.15-01-051, the Commission approved the Green Tariff Shared Renewables (GTSR) Programs for PG&E, SCE, and SDG&E. The Commission established a GTSRMA for each utility to cover administrative and marketing costs associated with the utility's GTSR program.^{20/} The reasonableness of costs recorded in a utility's GTSRMA is subject to review in the utility's ERRA compliance proceedings.^{21/} Chapter 11 of the Prepared Testimony describes the amounts incurred and recorded in PG&E's GTSRMA during the record period and demonstrates that they were reasonably incurred.

3. Green Tariff Shared Renewables Balancing Account

In D.15-01-051, the Commission also established the GTSRBA.^{22/} Chapter 11 also describes the amounts incurred and recorded in the GTSRBA during the record period, demonstrating that they were in compliance with applicable tariffs and Commission directives.

4. Renewables Portfolio Standard Cost Memorandum Account

In D.06-10-050, the Commission established the RPSCMA to track the third-party consultant costs incurred by the Commission and paid by PG&E in connection with the Commission's implementation and administration of the Renewables Portfolio Standard (RPS).^{23/} PG&E pays its share of the invoices, records the amounts in the RPSCMA, and

^{20/} D.15-01-051, pp. 112-15.

^{21/} D.15-01-051, p. 113.

^{22/} D.15-01-051, Finding of Fact 136 and 145.

^{23/} D.06-10-050, OP 8.

requests recovery of the balance in the RPSCMA through the ERRA application.^{24/} Chapter 15 includes a description of the RPSCMA. In 2019, the PG&E did not receive any invoices for payment of consulting services associated with this account.

5. Disadvantaged Communities Single Family Solar Affordable Homes Memorandum Account

In D.18-06-027, the Commission directed PG&E to establish the DACSASHMA to track the incremental startup cost associated with the DAC-SASH program. Chapter 16 of the Prepared Testimony describes the amounts incurred and recorded in PG&E's DACSASHMA during the record period and demonstrates that they were reasonably incurred.

6. Disadvantaged Communities Single Family Solar Affordable Homes Balancing Account

In D.18-06-027, the Commission also directed PG&E to establish the two-way DACSASHBA to track the DAC-SASH program budget. Chapter 16 also describes the amounts incurred and recorded in the DACSASHBA during the record period, demonstrating that they were in compliance Commission directives.

I. Additional ERRA Compliance Application Requirements

In recent years, a number of Commission decisions and/or settlements in earlier ERRA Compliance proceedings have required specific items to be included in ERRA Compliance applications. In addition to the items described above, PG&E is providing in its Prepared Testimony and/or workpapers information consistent with Commission directives and/or earlier settlements. The following table summarizes additional ERRA Compliance Application requirements adopted by the Commission in decisions or when it approved settlements, including the subject area, a brief description, source of the requirement, and the location in PG&E's testimony or workpapers. The requirements are organized chronologically to reflect when they were adopted by the Commission:

^{24/} See PG&E Electric Preliminary Statement Part EL:
https://www.pge.com/notes/rates/tariffs/tm2/pdf/ELEC_4413-E.pdf

Subject Area	Description	Source of Requirement	Location in Prepared Testimony or Workpapers
Generation Fuel Costs	Fuelco information.	D.05-09-006, Attachment A (Settlement Agreement, 4)	Chapter 6
Hedging	Include a “high level discussion of [PG&E’s] internal procedures and controls for ensuring compliance with Commission-approved hedging plans.”	D.11-07-039, OP 3	Chapter 6
STARs Alliance Costs	STARs Alliance activities and operating costs.	D.12-05-010, OP 3	Chapter 6 and associated workpapers
Diablo Canyon Seismic Studies	Recover balances in the DCSSBA (<i>i.e.</i> , the Diablo Canyon Seismic Studies Balancing Account), including balances recorded in the Independent Peer Review Panel subaccount.	D.12-09-008, Ops 4 and 10	Chapter 5 and associated workpapers
Audit Plan	Provision of a draft audit plan to Cal Advocates in November and meetings to review the draft audit plan.	D.14-01-011, Attachment A, §2.4.1 (2011 ERRa Settlement)	Provided to Cal Advocates on November 30, 2016
Least Cost Dispatch	Review and document material changes to LCD business processes.	D.14-01-011, Attachment A, §2.4.2 (2011 ERRa Settlement)	Chapter 1 and associated workpapers
Least Cost Dispatch	Document review and justify changes to LCD models.	D.14-01-011, Attachment A, §2.4.2 (2011 ERRa Settlement)	Chapter 1 and associated workpapers
ERRa Balancing Account	Audit of ERRa balancing account.	D.14-01-011, Attachment A, §2.4.3 (2011 ERRa Settlement)	Chapter 13 ^{25/}
UOG Outages	PG&E will address UOG outages and associated fuel costs, if applicable, in future ERRa Compliance proceedings.	D.14-01-011, Attachment A, §2.4.4 (2011 ERRa Settlement)	Chapters 2-4, 6 and associated workpapers
Long-Term Seismic Program Costs	Include LTSP costs in DCSSBA for review in ERRa compliance proceeding.	D.14-08-032 at p. 411	Chapter 5 and associated workpapers

^{25/} D.14-01-011, OP 6 and the 2011 ERRa Settlement §2.4.3 require an ERRa balancing account audit every four (4) years, with the results included in the ERRa compliance application that immediately follows the completion of the audit. The last audit was performed in 2017.

Subject Area	Description	Source of Requirement	Location in Prepared Testimony or Workpapers
Least Cost Dispatch	Include LCD showing and metrics for economically triggered demand response programs.	D.15-05-006 and D.15-12-015	Chapter 1 and associated workpapers
Green Tariff Shared Renewables	Review GTSR Program administration and marketing costs for the record period in memorandum account.	D.15-01-051 at p. 113	Chapter 11 and associated workpapers
Green Tariff Shared Renewables	Review GTSR balancing account entries, including true-up of costs and revenues.	D.15-01-051, Conclusion of Law 59	Chapter 11
Least Cost Dispatch	Specified Demand Response Program Metrics included in least cost dispatch chapter.	D.16-12-045, Settlement § 2.1 (2014 ERRA Settlement)	Chapter 1
Least Cost Dispatch	Evaluation of price forecast accuracy for all days of record period.	D.16-12-045, Settlement § 2.3 (2014 ERRA Settlement)	Chapter 1 and associated workpapers
Least Cost Dispatch	Description of decision-making process re use of proxy or registered costs for resources.	D.16-12-045, Settlement § 2.4	Chapter 1
Least Cost Dispatch	Information regarding resources that did not have bids submitted.	D.16-12-045, Settlement § 2.5	Chapter 1 (non-specific, non-confidential); Workpapers (specific, confidential)
Least Cost Dispatch	PG&E and Cal Advocates to work informally to address hydro-self-scheduling documentation and information concerning dispatchable renewable resources to be included in future ERRA Compliance applications.	D.16-12-045, Settlement §§ 2.7-2.8 (2014 ERRA Settlement)	Chapter 1
Demand Response	Definition of “operational constraints” as a reason not to dispatch when DR program economic triggers are met.	D.16-12-045, Settlement § 3.2 (2014 ERRA Settlement)	Chapter 1
Demand Response	General set of guidelines for situations in which “customer fatigue” may occur in connection with DR programs.	D.16-12-045, Settlement § 3.2 (2014 ERRA Settlement)	Chapter 1
Demand Response	Definition of “opportunity cost” as a reason not to dispatch DR programs when economic triggers are met.	D.16-12-045, Settlement § 3.6 (2014 ERRA Settlement)	Chapter 1

Subject Area	Description	Source of Requirement	Location in Prepared Testimony or Workpapers
Demand Response	Develop quantitative opportunity cost measure as a metric.	D.16-12-045, Settlement §§ 3.8-3.9 (2014 ERRA Settlement)	Chapter 1
Maximum Disallowance Amount	Standard of Conduct 4 maximum disallowance amount and associated workpapers.	D.16-12-045, Settlement § 5.3 (2014 ERRA Settlement)	Chapter 14
Incentive for Distributed Energy Resources	Review and recovery of incentive payments for certain distributed energy resources.	D.16-12-036, OP 22; D.18-02-004, OP 2.aa.	Not applicable to this ERRA Compliance application
Least Cost Dispatch	Provide analysis of renewable resource opportunity costs, curtailment decisions, and demand response opportunity cost metrics.	D.17-03-021, Settlement § 1.1 (2015 ERRA Settlement)	Chapter 1
PABA: GHG Accounting	Agreed-upon verification method for PG&E's GHG and WAC.	D.17-03-021, OP 3	Chapter 12
UOG: Transformer Inspections	Report results of inspections under transformer inspection program and provide a report on national industry standards.	D.18-05-004, OP 4 and 5	Chapter 4
UOG: Nuclear	Provide summary list of all Nuclear Regulatory Commission findings and corrective actions.	D.18-05-004, OP 7	Chapter 4
PABA: GHG Accounting	Include GHG information from D.14-10-033 Attachment C (Template C) and D (Template D-2).	D.18-05-004, OP 8	Chapter 12
DAC-SASH Memorandum Account	Review start-up costs in the DAC-SASH memorandum account.	D.18-06-027, OP 10	Chapter 16
DAC-SASH Balancing Account	Review entries into the DAC-SASH balancing account.	D.18-06-027, OP 15	Chapter 16
PABA Review	Review accuracy of entries recorded to the Portfolio Allocation Balancing Account.	D.18-10-019, OP 8	Chapter 12
GHG Procurement	Include analysis on decision to financially settle or physically settle tolling agreements.	D.19-02-005, Settlement § 4.2 (2017 ERRA Settlement)	Chapter 7
UOG: Hydro	Report on corrective action implementation progress for Belden powerhouse in 2019 ERRA Compliance.	D.20-02-006, Section § 2.2	Chapter 2

IV. OVERVIEW OF PREPARED TESTIMONY

PG&E's Prepared Testimony in support of this Application, which is being served to Cal Advocates concurrent with the Application, consists of one exhibit, which is identified as Exhibit PG&E-1, which is the public version of PG&E's Prepared Testimony, and Exhibit PG&E-1C, which is the confidential version of PG&E's Prepared Testimony. Exhibit PG&E-1 is organized into sixteen chapters, and an appendix, as follows:

Chapter 1	Least-Cost Dispatch and Economically-Triggered Demand Response
Chapter 2	Utility-Owned Generation: Hydroelectric
Chapter 3	Utility-Owned Generation: Fossil and Other Generation
Chapter 4	Utility-Owned Generation: Nuclear
Chapter 5	Costs Incurred and Recorded in the Diablo Canyon Seismic Studies Balancing Account
Chapter 6	Generation Fuel Costs and Electric Portfolio Hedging
Chapter 7	Greenhouse Gas Compliance Instrument Procurement
Chapter 8	Resource Adequacy
Chapter 9	Contract Administration
Chapter 10	CAISO Settlements and Monitoring
Chapter 11	Review Recorded in the Green Tariff Shared Renewables Memorandum Account and the Green Tariff Shared Renewables Balancing Account
Chapter 12	Summary of PABA Entries for the Record Period
Chapter 13	Summary of ERRA Entries for the Record Period
Chapter 14	Maximum Potential Disallowance
Chapter 15	Cost Recovery and Revenue Requirements
Chapter 16	Review Entries Recorded in the Disadvantaged Communities Single-family Affordable Solar Homes Balancing Account and the Disadvantaged Communities Single-family Affordable Solar Homes Memorandum Account
Appendix A	Statements of Qualifications

This testimony, and the corresponding workpapers, demonstrate that during the record period January 1 through December 31, 2019, PG&E complied with its BPP in the areas of least-cost dispatch, fuel procurement costs, hedging, resource adequacy sales, and GHG compliance instrument procurement. In addition, the testimony demonstrates that PG&E's administrative

and marketing costs for the GTSR program and DAC-SASH program were reasonable, and that PG&E satisfied the reasonable manager standard for contract management and the operation of its UOG facilities.

The testimony demonstrates that PG&E made appropriate entries to its PABA, ERRRA, DCSSBA, GTSRBA, and DACSASHBA. It also demonstrates that the Diablo Canyon Seismic Studies cost recovery proposal in Chapter 15 is just and reasonable and should be adopted.

PG&E will provide a public (redacted) version of its Prepared Testimony to parties who request a copy and will also provide a confidential (unredacted) version to parties who request a copy and execute a Non-Disclosure Agreement.

V. INFORMATION REQUIRED BY THE COMMISSION'S RULES OF PRACTICE AND PROCEDURE AND OTHER AUTHORITY (RULE 2.1)

PG&E files this Application pursuant to Sections 451, 454, 454.5, and 701 of the Public Utilities Code of the State of California, the Commission's Rules of Practice and Procedure, and prior decisions, orders and resolutions of the Commission, including, but not limited to, D.02-10-062, D.02-12-074, D.03-06-067, D.07-12-052, D.08-11-008, D.12-01-033, D.12-04-046, D.14-08-032, D.15-01-051, D.15-05-006, D.15-10-031, D.15-12-015, and Commission Resolutions concerning approval of or modifications to PG&E's Conformed 2014 BPP.

A. Legal Name and Principal Place of Business (Rule 2.1(a))

The legal name of the Applicant is Pacific Gas and Electric Company. PG&E's principal place of business is 77 Beale Street, San Francisco, California, 94105.

B. Correspondence, Communications, and Service (Rule 2.1(b))

All correspondence, communications, and service of papers regarding this Application should be directed to:

Kristin D. Charipar
Law Department
Pacific Gas and Electric Company
P.O. Box 7442 (B30A)
San Francisco, CA 94120-7442
Telephone: (415) 973-6117
Facsimile: (415) 973-5520
E-mail: Kristin.Charipar@pge.com

George Zahariudakis
Regulatory Affairs
Pacific Gas and Electric Company
P.O. Box 770000 (B23A)
San Francisco, CA 94177-0001
Telephone: (415) 973-2079
Facsimile: (415) 973-6520
E-mail: George.Zahariudakis@pge.com

C. Proposed Categorization (Rule 2.1(c))

PG&E proposes that this Application be categorized as a ratesetting proceeding.

D. Need for Hearings (Rule 2.1(c))

PG&E anticipates that evidentiary hearings may be requested by other parties to this proceeding, but the need for evidentiary hearings will depend on the degree to which and grounds on which other parties might contest the proposals contained in this Application. While PG&E hopes to resolve the issues raised in this Application without hearings, such as through more informal procedures including discovery, evidentiary hearings may be necessary.

E. Issues to be Considered (Rule 2.1(c))

PG&E proposes that the following issues be considered in this proceeding for the 2019 record period:

1. Did PG&E achieve least-cost dispatch of its energy resources;
2. Did PG&E operate and manage its UOG facilities prudently;
3. Did PG&E prudently administer and manage its QF and non-QF contracts;
4. Were the costs incurred and recorded in the DCSSBA in 2019 reasonable;
5. Did PG&E's fuel procurement and hedging activities comply with the 2014 BPP;
6. Did PG&E's Greenhouse Gas Compliance Instrument Procurement comply with the 2014 BPP;
7. Did PG&E's resource adequacy sales comply with the BPP during the effective period;
8. Were the costs incurred and recorded in the GTSRMA in 2019 reasonable;
9. Were the costs incurred and recorded in the GTSRBA in 2019 in compliance with applicable tariffs and Commission directives;
10. Were PG&E's entries in the PABA for 2019 accurate;
11. Were PG&E's entries in the ERRR for 2019 appropriate, correctly stated, and in compliance with Commission decisions;
12. Should PG&E's request to recover \$3.996 million recorded in the DCSSBA be approved;
13. Were the costs incurred and recorded in the DACSASHMA in 2019 reasonable; and

14. Were the costs incurred and recorded in the DACSASHBA in 2019 in compliance with applicable tariffs and Commission directives?

F. Relevant Safety Consideration (Rule 2.1(c))

In D.16-01-017, the Commission amended Rule 2.1(c) requiring an applicant to identify all relevant safety considerations implicated by an Application to which the assigned Commissioners and presiding officer could refer to during the proceeding. In order to ensure that safety considerations have received full consideration by parties and the Commission, PG&E's Prepared Testimony includes specific discussions which detail PG&E's efforts to promote public safety: Chapters 2 and 3 discuss PG&E's commitment to safety at PG&E-owned generation facilities, and Chapter 9 discusses PG&E's protocols and practices related to the administration of third-party power contracts. In addition, as the Commission explained in D.14-12-053, the "[s]afe and reliable provision of utilities at predictable rates promotes public safety."^{26/} Chapters 5-7, 10-13, and 15 of PG&E's Prepared Testimony demonstrate that the costs incurred by PG&E during the record period were reasonable, that the entries to the PABA and ERRA balancing account were appropriate, and that the seismic studies, GTSR Program, and DAC-SASH program costs incurred by PG&E are reasonable and result in predictable rates for customers.

G. Procedural Schedule (Rule 2.1(c))

PG&E proposes the following procedural schedule for this 2019 ERRA Compliance proceeding on a preliminary basis. After filing, PG&E will consult with Cal Advocates and any other intervening parties to determine whether a mutually acceptable schedule can be developed:

PG&E files Application	February 28, 2020
Notice of PG&E's Application appears in Daily Calendar	
Protests and Responses filed and served	30 days after Daily Calendar Notice
Reply filed and served	10 days after Protests and Responses
Supplemental Testimony (per D.20-02-047)	April 13, 2020

^{26/} D.14-12-053, pp. 12-13.

Prehearing Conference	May 7, 2020
Cal Advocates and Intervenor Reply Testimony	June 22, 2020
Intervenor Reply	July 6, 2020
PG&E Rebuttal Testimony	July 29, 2020
Evidentiary Hearings	August 24 – August 28, 2020
Concurrent Opening Briefs	October 9, 2020
Concurrent Reply Briefs	October 30, 2020
Proposed Decision	Q1 2021
Final Decision	Q1 2021

H. Articles of Incorporation (Rule 2.2)

PG&E is, and since October 10, 1905, has been, an operating public utility corporation organized under California law. It is engaged principally in the business of furnishing electric and gas services in California. A certified copy of PG&E's Restated Articles of Incorporation, effective April 12, 2004, was filed with the Commission on May 3, 2004, with PG&E's Application 04-05-005. These articles are incorporated herein by reference pursuant to Rule 2.2 of the Commission's Rules.

I. Authority to Increase Rates (Rule 3.2)

This application requests an increase in electric rates and is not a general rate increase application, so Rule 3.2 applies except for subsections (4), (6), (7), (8), and (9) of Rule 3.2(a).

J. Balance Sheet and Income Statement (Rule 3.2(a)(1))

Exhibit A of the Application presents PG&E's most recent Balance Sheet and Income Statements for the period ending December 31, 2019.

K. Statement of Presently Effective Rates (Rules 3.2(a)(2))

PG&E's presently effective electric rates were filed on February 7, 2020, in Application 20-02-004 and are incorporated by reference herein.

L. Statement of Proposed Increases or Changes in Rates (Rule 3.2(a)(3))

Approval of this Application would increase electric rates for bundled service customers (those who receive electric generation as well as transmission and distribution service from PG&E) and for customers who purchase electricity from other suppliers (direct access and

community choice aggregation) by less than one percent, therefore a statement setting forth PG&E's proposed increases or changes in electric rates is not required.

M. Summary of Earnings (Rule 3.2(a)(5) and (6))

The revenues, expenses, rate bases and rate of return for PG&E's Electric and Gas Departments for the recorded year of 2018 were submitted in support of Application 19-04-015 on April 22, 2019, and are incorporated herein by reference.

N. Type of Rate Change Requested (Rule 3.2(a)(3) and (10))

Results of Operations at proposed rates are not required since the proposed changes in revenues do not exceed one percent. This Application would result in a slight increase to system average bundled customer electric rates. The electric revenue requested increase over current electric revenue would result in a 0.02 percent increase in monthly electric bills for a typical residential non-CARE customer using 500 kilowatts per month, from \$124.08 to \$124.10. Individual customers' bills may differ. This Application would minimally impact direct access and community choice aggregation customers.

O. Notice to Governmental Entities (Rule 3.2(b))

Within 20 days of filing this Application, PG&E will mail or send electronically a notice stating in general terms the proposed revenues, rate changes and ratemaking mechanisms requested in this Application to parties listed in Exhibit B of this Application, including the State of California and cities and counties served by PG&E.

P. Publication (Rule 3.2(c))

Within 20 days of filing this Application, PG&E will publish in newspapers of general circulation in each county in its service territory a notice of filing.

Q. Notice to Customers (Rule 3.2(d))

Within 45 days of filing this Application, PG&E will include notices with the regular bills mailed to all customers affected by the proposed changes, and within twenty days of completion of mailing PG&E will file proof of compliance with Rule 3.2(e).

PG&E has served this Application on the official service lists for A.19-02-018 (2018 ERRA Compliance), A.11-11-019 (STARS Alliance exemption to affiliate transaction rules), A.10-01-014 (Diablo Canyon Seismic Studies), A.12-01-008 et al (GTSR program application), R.17-06-026 (Power Charge Indifference Adjustment Rulemaking), R.14-07-002 (DAC-SASH program rulemaking).

VI. CONCLUSION

WHEREFORE, PG&E respectfully requests that the Commission issue a decision in this proceeding that makes the following findings for the 2019 record period:

1. PG&E achieved least-cost dispatch of its energy resources;
2. PG&E prudently administered and managed its UOG facilities;
3. PG&E reasonably operated and managed its QF and non-QF contracts;
4. The costs incurred and recorded in the DCSSBA in 2019 were reasonable;
5. PG&E's fuel procurement and hedging activities complied with the 2014 BPP;
6. PG&E's Greenhouse Gas Compliance Instrument Procurement complied with the 2014 BPP;
7. PG&E's resource adequacy sales complied with the BPP during the effective period;
8. The costs incurred and recorded in the GTSRMA in 2019 were reasonable;
9. The costs incurred and recorded in the GTSRBA in 2019 were in compliance with applicable tariffs and Commission directives;
10. PG&E's entries in the PABA for 2019 are accurate;
11. PG&E's entries in the ERRA for 2019 were appropriate, correctly stated, and in compliance with Commission decisions;
12. PG&E's request to recover \$3.996 million recorded in the DCSSBA should be approved;
13. The costs incurred and recorded in the DACSASHMA in 2019 are reasonable;

14. The costs incurred and recorded in the DACSASHBA in 2019 are in compliance with applicable tariffs and Commission directives; and
15. Any other remedy or relief the Commission deems appropriate.

Respectfully Submitted,

JENNIFER K. POST
KRISTIN D. CHARIPAR

By: /s/ Kristin D. Charipar
KRISTIN D. CHARIPAR

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77 Beale Street, B30A
San Francisco, CA 94105
Telephone: (415) 973-6117
Facsimile: (415) 973-5520
E-Mail: Kristin.Charipar@pge.com

Attorneys for
PACIFIC GAS AND ELECTRIC COMPANY

Dated: February 28, 2020

VERIFICATION

I, the undersigned, say:

I am an officer of Pacific Gas and Electric Company, a corporation, and am authorized, pursuant to Rule 2.1 and Rule 1.11 of the Rules of Practice and Procedure of the CPUC, to make this Verification for an on behalf of said Corporation, and I make this Verification for that reason. I have read the foregoing Application, and I am informed and believe that the matters therein concerning Pacific Gas and Electric Company are true.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct to the best of my knowledge.

Executed on February 25, 2020, at San Francisco, California.

By: /s/ Robert S. Kenney
ROBERT S. KENNEY
Vice President, State and Regulatory Affairs

EXHIBIT A

PACIFIC GAS AND ELECTRIC COMPANY
(DEBTOR-IN-POSSESSION)
CONSOLIDATED STATEMENTS OF INCOME
(in millions)

	Year ended December 31,		
	2019	2018	2017
Operating Revenues			
Electric	\$ 12,740	\$ 12,713	\$ 13,127
Natural gas	4,389	4,047	4,011
Total operating revenues	17,129	16,760	17,138
Operating Expenses			
Cost of electricity	3,095	3,828	4,309
Cost of natural gas	734	671	746
Operating and maintenance	8,750	7,153	6,383
Wildfire-related claims, net of insurance recoveries	11,435	11,771	—
Depreciation, amortization, and decommissioning	3,233	3,036	2,854
Total operating expenses	27,247	26,459	14,292
Operating Income (Loss)	(10,118)	(9,699)	2,846
Interest income	82	74	30
Interest expense	(912)	(914)	(877)
Other income, net	239	426	119
Reorganization items, net	(320)	—	—
Income (Loss) Before Income Taxes	(11,029)	(10,113)	2,118
Income tax provision (benefit)	(3,407)	(3,295)	427
Net Income (Loss)	(7,622)	(6,818)	1,691
Preferred stock dividend requirement	14	14	14
Income (Loss) Available for Common Stock	\$ (7,636)	\$ (6,832)	\$ 1,677

See accompanying Notes to the Consolidated Financial Statements.

PACIFIC GAS AND ELECTRIC COMPANY
(DEBTOR-IN-POSSESSION)
CONSOLIDATED BALANCE SHEETS
(in millions)

	Balance at December 31,	
	2019	2018
ASSETS		
Current Assets		
Cash and cash equivalents	\$ 1,122	\$ 1,295
Accounts receivable		
Customers (net of allowance for doubtful accounts of \$43 and \$56 at respective dates)	1,287	1,148
Accrued unbilled revenue	969	1,000
Regulatory balancing accounts	2,114	1,435
Other	2,647	2,688
Regulatory assets	315	233
Inventories		
Gas stored underground and fuel oil	97	111
Materials and supplies	550	443
Income taxes receivable	—	5
Other	635	448
Total current assets	9,736	8,806
Property, Plant, and Equipment		
Electric	62,707	59,150
Gas	22,688	21,556
Construction work in progress	2,675	2,564
Other	18	—
Total property, plant, and equipment	88,088	83,270
Accumulated depreciation	(26,453)	(24,713)
Net property, plant, and equipment	61,635	58,557
Other Noncurrent Assets		
Regulatory assets	6,066	4,964
Nuclear decommissioning trusts	3,173	2,730
Operating lease right of use asset	2,279	—
Income taxes receivable	66	66
Other	1,659	1,348
Total other noncurrent assets	13,243	9,108
TOTAL ASSETS	\$ 84,614	\$ 76,471

See accompanying Notes to the Consolidated Financial Statements.

PACIFIC GAS AND ELECTRIC COMPANY
(DEBTOR-IN-POSSESSION)
CONSOLIDATED BALANCE SHEETS
(in millions, except share amounts)

	Balance at December 31,	
	2019	2018
LIABILITIES AND SHAREHOLDERS' EQUITY		
Current Liabilities		
Short-term borrowings	\$ —	\$ 3,135
Long-term debt, classified as current	—	18,209
Debtor-in-possession financing, classified as current	1,500	—
Accounts payable		
Trade creditors	1,949	1,972
Regulatory balancing accounts	1,797	1,076
Other	675	498
Operating lease liabilities	553	—
Disputed claims and customer refunds	—	220
Interest payable	4	227
Wildfire-related claims	—	14,226
Other	1,263	1,497
Total current liabilities	7,741	41,060
Noncurrent Liabilities		
Regulatory liabilities	9,270	8,539
Pension and other postretirement benefits	1,884	2,026
Asset retirement obligations	5,854	5,994
Deferred income taxes	442	3,405
Operating lease liabilities	1,726	—
Other	2,626	2,492
Total noncurrent liabilities	21,802	22,456
Liabilities Subject to Compromise	49,736	—
Contingencies and Commitments (Notes 14 and 15)		
Shareholders' Equity		
Preferred stock	258	258
Common stock, \$5 par value, authorized 800,000,000 shares; 264,374,809 shares outstanding at respective dates	1,322	1,322
Additional paid-in capital	8,550	8,550
Reinvested earnings	(4,796)	2,826
Accumulated other comprehensive income (loss)	1	(1)
Total shareholders' equity	5,335	12,955
TOTAL LIABILITIES AND SHAREHOLDERS' EQUITY	\$ 84,614	\$ 76,471

See accompanying Notes to the Consolidated Financial Statements.

EXHIBIT B

SERVICE OF NOTICE OF APPLICATION

In accordance with Rule 3.2(b), Applicant will mail a notice to the following, stating in general terms its proposed change in rates.

State of California

To the Attorney General and the Department of General Services.

State of California
Office of Attorney General
1300 I St Ste 1101
Sacramento, CA 95814

and

Department of General Services
Office of Buildings & Grounds
505 Van Ness Avenue, Room 2012
San Francisco, CA 94102

Counties

To the County Counsel or District Attorney and the County Clerk in the following counties:

Alameda	Mariposa	Santa Clara
Alpine	Mendocino	Santa Cruz
Amador	Merced	Shasta
Butte	Modoc	Sierra
Calaveras	Monterey	Siskiyou
Colusa	Napa	Solano
Contra Costa	Nevada	Sonoma
El Dorado	Placer	Stanislaus
Fresno	Plumas	Sutter
Glenn	Sacramento	Tehama
Humboldt	San Benito	Trinity
Kern	San Bernardino	Tulare
Kings	San Francisco	Tuolumne
Lake	San Joaquin	Yolo
Lassen	San Luis Obispo	Yuba
Madera	San Mateo	
Marin	Santa Barbara	

Municipal Corporations

To the City Attorney and the City Clerk of the following municipal corporations:

Alameda	Colusa	Hanford
Albany	Concord	Hayward
Amador City	Corcoran	Healdsburg
American Canyon	Corning	Hercules
Anderson	Corte Madera	Hillsborough
Angels Camp	Cotati	Hollister
Antioch	Cupertino	Hughson
Arcata	Daly City	Huron
Arroyo Grande	Danville	Ione
Arvin	Davis	Isleton
Atascadero	Del Rey Oaks	Jackson
Atherton	Dinuba	Kerman
Atwater	Dixon	King City
Auburn	Dos Palos	Kingsburg
Avenal	Dublin	Lafayette
Bakersfield	East Palo Alto	Lakeport
Barstow	El Cerrito	Larkspur
Belmont	Elk Grove	Lathrop
Belvedere	Emeryville	Lemoore
Benicia	Escalon	Lincoln
Berkeley	Eureka	Live Oak
Biggs	Fairfax	Livermore
Blue Lake	Fairfield	Livingston
Brentwood	Ferndale	Lodi
Brisbane	Firebaugh	Lompoc
Buellton	Folsom	Loomis
Burlingame	Fort Bragg	Los Altos
Calistoga	Fortuna	Los Altos Hills
Campbell	Foster City	Los Banos
Capitola	Fowler	Los Gatos
Carmel	Fremont	Madera
Ceres	Fresno	Manteca
Chico	Galt	Maricopa
Chowchilla	Gilroy	Marina
Citrus Heights	Gonzales	Mariposa
Clayton	Grass Valley	Martinez
Clearlake	Greenfield	Marysville
Cloverdale	Gridley	McFarland
Clovis	Grover Beach	Mendota
Coalinga	Guadalupe	Menlo Park
Colfax	Gustine	Merced
Colma	Half Moon Bay	Mill Valley

Millbrae
Milpitas
Modesto
Monte Sereno
Monterey
Moraga
Morgan Hill
Morro Bay
Mountain View
Napa
Newark
Nevada City
Newman
Novato
Oakdale
Oakland
Oakley
Orange Cove
Orinda
Orland
Oroville
Pacific Grove
Pacifica
Palo Alto
Paradise
Parlier
Paso Robles
Patterson
Petaluma
Piedmont
Pinole
Pismo Beach
Pittsburg
Placerville
Pleasant Hill
Pleasanton
Plymouth
Point Arena
Portola
Portola Valley
Rancho Cordova
Red Bluff
Redding
Redwood City
Reedley
Richmond

Ridgecrest
Rio Dell
Rio Vista
Ripon
Riverbank
Rocklin
Rohnert Park
Roseville
Ross
Sacramento
Saint Helena
Salinas
San Anselmo
San Bruno
San Carlos
San Francisco
San Joaquin
San Jose
San Juan Bautista
San Leandro
San Luis Obispo
San Mateo
San Pablo
San Rafael
San Ramon
Sand City
Sanger
Santa Clara
Santa Cruz
Santa Maria
Santa Rosa
Saratoga
Sausalito
Scotts Valley
Seaside
Sebastopol
Selma
Shafter
Shasta Lake
Soledad
Solvang
Sonoma
Sonora
South San Francisco
Stockton
Suisun City

Sunnyvale
Sutter Creek
Taft
Tehama
Tiburon
Tracy
Trinidad
Turlock
Ukiah
Union City
Vacaville
Vallejo
Victorville
Walnut Creek
Wasco
Waterford
Watsonville
West Sacramento
Wheatland
Williams
Willits
Willows
Windsor
Winters
Woodland
Woodside
Yountville
Yuba City